

Exhibit A

EXHIBIT A**SWITCH, LTD.'S PROPOSED CONSTRUCTIONS FOR DISPUTED CLAIM TERMS, PHRASES,
AND CLAUSES AND PROPOSED EVIDENCE IN SUPPORT.**

	Term	Switch's Proposed Construction	Supporting Evidence¹
1.	the two rows	No Construction Necessary. Not Indefinite – the phrase refers to “the plurality of cabinets being disposed in two parallel rows.”	'389 Patent at 1:54-60; 6:9-12; 5:20-25; 6:42-46; 10:28-12:7
2.	wherein the second plurality of vertical support brackets each further support portions of the cool air ductwork below the thermal barrier ceiling	No Construction Necessary. <i>Alternative Construction for “Cool Air Ductwork”:</i> Channels, vents, or tubes to convey or transport cool air.	'389 Patent at 8:47-57; 7:1-11; 7:47-55; 7:23-37. “Support,” <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 1256. “Duct,” “Ducting,” and “Ductwork,” <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 385.
3.	the thermal barrier ceiling being disposed below the ceiling and creating an airspace between the ceiling and the thermal barrier ceiling	No Construction Necessary.	'389 Patent at 4:43-49; 5:9-19; 6:55-67; 8:47-57. “Dispose,” the AMERICAN HERITAGE DICTIONARY (2d Coll. Ed. 1982) at 407. “Airspace,” <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 28.
4.	a hot containment chamber, the hot containment chamber being contiguous with the thermal barrier ceiling and providing an opening into the airspace	No Construction Necessary.	389 Patent 7:43-48; 8:47-57; Fig. 1B, 2, 4B, 5. “Chamber,” the AMERICAN HERITAGE DICTIONARY (2d Coll. Ed. 1982) at 257.

¹ Switch reserves the right to rely on for its benefit any and all intrinsic and extrinsic evidence cited by Defendants.

	Term	Switch's Proposed Construction	Supporting Evidence
5.	a first horizontal support bracket disposed above a cabinet height that intersects a middle hot aisle portion so that an area on two separate sides of each hot aisle where the cabinets can be placed does not have any vertical support brackets disposed therein	No Construction Necessary.	Fig. 5, 8:30-46; 7:38-8:2 “Intersect,” and “Intersection,” <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2003) at 655.
6.	a plurality of ladder racks and a plurality of conduits at locations that are on an opposite side of some of the vertical support brackets that hold portions of a thermal shield such that telecommunications wiring and power wiring are disposed within the plurality of ladder racks and the plurality of conduits, adjacent to the thermal shield.	No Construction Necessary.	“Dispose,” the AMERICAN HERITAGE DICTIONARY (2d Coll. Ed. 1982) at 407. “Opposite,” MERRIAM-WEBSTER'S COLLEGIATE DICTIONARY (11TH EDITION, 2014) at 870; Oxford Dictionary of English (3rd Edition, 2010) at 1246.
7.	each [second] vertical support bracket being disposed on the floor at one end	No Construction Necessary.	“Dispose,” the AMERICAN HERITAGE DICTIONARY (2d Coll. Ed. 1982) at 407.
8.	a second plurality of horizontal support brackets that are each parallel with the floor and parallel with two parallel rows of cabinets	No Construction Necessary.	
9.	each of the second plurality of horizontal support brackets connecting to a different one of the first plurality of vertical support brackets at a height that is above the cabinet height	No Construction Necessary.	“Connect,” <i>The American Heritage Dictionary</i> (2d Coll. Ed. 1982) at 311.
10.	a second plurality of vertical support brackets disposed in a row	No Construction Necessary.	'389 Patent at 8:47-57. “Dispose,” the AMERICAN HERITAGE DICTIONARY (2d Coll. Ed. 1982) at 407.

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12.	providing a thermal partition at each of two ends of the two rows to further seal the hot aisle	Not Indefinite; No Construction Necessary. <i>Alternative Construction for "Thermal Partition":</i> "a physical partition that assists in maintaining a thermal gradient"	'389 Patent at 8:25-29; 5:30-38; 8:3-13. "Thermal," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 1296-97.
13.	seal the hot aisle	No Construction Necessary.	'389 Patent at 8:25-29; 5:30-38; 8:3-13. "Seal," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 1119.
14.	a thermal barrier ceiling	No Construction Necessary. <i>Alternative:</i> An upper barrier that hot air passes through.	"Barrier," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 100. '389 Patent at 6:55-61; 5:9-16.
15.	hot containment chamber	No Construction Necessary. <i>Alternative:</i> Hot air containment chamber.	'389 Patent at 6:55-61; 5:9-16; 8:3-13; 6:55-60; 8:7-12; 7:43-49; 8:59-9:50; 10:28-12:7.
16.	airspace	No Construction Necessary.	"Airspace," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 28.
17.	sealed chamber	No Construction Necessary.	"Chamber," the AMERICAN HERITAGE DICTIONARY (2d Coll. Ed. 1982) at 257. '389 Patent at 6:55-61; 5:9-16; 8:3-13.

	Term	Switch's Proposed Construction	Supporting Evidence
18.	hot air aisle	No Construction Necessary. <i>Alternative:</i> an aisle between two rows into which heat from electronic equipment in the rows generally passes such that the aisle generally contains warmer air than the area outside the aisle	'389 Patent at 5:5-9
19.	middle hot aisle portion	No Construction Necessary. <i>Alternative:</i> "Middle portion of the hot aisle."	'389 Patent at 8:38-46. "Middle," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 786.
20.	ladder racks	No Construction Necessary. <i>Alternative:</i> "Racks for holding other elements including but not limited to cabling, wires, conduit, sensors, or lights."	"Ladder," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 696. "Rack," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 1024.
21.	conduits	No Construction Necessary. <i>Alternative:</i> pipes, tubes, passage, or the like for wires, air, or cables to go through."	"Conduit," <i>Oxford Dictionary of English</i> (3rd Edition, 2010) at 364
22.	each hot aisle	No Construction Necessary; Not Indefinite.	'389 Patent at 4:43-49; 10:36-57.
23.	the hot air containment chamber	No Construction Necessary; Not Indefinite.	'389 Patent at 6:55-61; 5:9-16; 8:3-13; 6:55-60; 8:7-12; 7:43-49; 8:59-9:50; 10:28-12:7.

	Term	Switch's Proposed Construction	Supporting Evidence
24.	thermal shield	No Construction Necessary. <i>Alternative:</i> a physical partition that assists with maintaining a thermal gradient.	'389 Patent at 2:23-27. "Shield," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 1148. "Thermal," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 1296-97.
25.	the hot aisle area	No Construction Necessary; Not Indefinite. <i>Alternative:</i> "area of the hot aisle."	'389 Patent at 10:28-12:7.
26.	intersects	No Construction Necessary. <i>Alternative:</i> "passes through or across, or runs into, the 'middle hot aisle portion'"	"intersect" and "intersection," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2003) at 672.
27.	assisting in supporting	No Construction Necessary.	"Support," <i>Merriam-Webster's Collegiate Dictionary</i> (11th Ed. 2014) at 1256.
28.	contiguous	No Construction Necessary. <i>Alternative:</i> "sharing a border, adjacent to, kitty-corner to, or across from."	"Contiguous," <i>Merriam-Webster's Collegiate Dictionary</i> (11 th ed. 2003) at 270.